



OFFICE OF INSPECTOR GENERAL
U.S. Agency for International Development

USAID Adapted To Continue Program Monitoring During COVID-19, But the Effectiveness of These Efforts Is Still To Be Determined

AUDIT REPORT 9-000-21-007-P
May 21, 2021

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MEMORANDUM

DATE: May 21, 2021

TO: USAID/Bureau for Policy, Planning, and Learning, Assistant to the Administrator, Michele Sumilas

FROM: Global and Strategic Audits Division Director, Emily Gardiner /s/

SUBJECT: USAID Adapted To Continue Program Monitoring During COVID-19, But the Effectiveness of Its Efforts Is Still To Be Determined (9-000-21-007-P)

This memorandum transmits the final report on our audit of USAID missions' capacity to monitor during COVID-19. Our audit objectives were to identify (1) what was the impact of COVID-19 on USAID missions' capacity to monitor programs and (2) what steps USAID has taken to mitigate the effects of the pandemic on program monitoring. In finalizing the report, we considered your comments on the draft and included them in their entirety in appendix C. We are not making any recommendations.

We appreciate the assistance you and your staff provided to us during this audit.

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INTRODUCTION

Following the emergence of the novel coronavirus SARS-CoV-2, the World Health Organization declared COVID-19 a Public Health Emergency of International Concern on January 30, 2020, and a pandemic on March 11, 2020. From March 14, 2020, to December 9, 2020, USAID authorized the return of U.S. Government personnel to the United States. During this period, USAID headquarters and missions provided maximum telework flexibilities, with 40 percent of overseas Agency employees teleworking from the United States, while personnel remaining at overseas missions were severely limited in their ability to travel both within and outside of their countries. By October 2020, over 90 percent of USAID missions reported that their capability to monitor foreign assistance programs was reduced or significantly restricted due to the impacts of COVID-19.¹

USAID's program cycle is the operational model for planning, delivering, assessing, and adapting development programming to advance U.S. foreign and economic policy and American values. The program cycle is designed to help the Agency make strategic decisions and learn from monitoring, evaluations, and other relevant information sources. Monitoring plays a critical role throughout the program cycle and is used to determine whether USAID is accomplishing what it set out to achieve, as well as what effects programming has in a location and how programming should adapt to changing environments.²

The USAID Office of Inspector General (OIG) also plays a role in assessing and monitoring foreign aid and development activities through conducting independent financial and performance audits and issuing advisories to alert Agency management to identified risk areas. In May 2020, OIG issued an advisory notice highlighting that program monitoring has been a longstanding challenge for USAID and noting that this challenge was further exacerbated by COVID-19.³

We initiated this audit to provide an objective analysis of the impact COVID-19 has had, and continues to have, on USAID and its ability to monitor its programs and to report our findings to external interested parties, including congressional stakeholders. This audit responds to our statutory mandate to provide oversight of USAID's COVID-19 relief efforts.⁴ Our audit objectives were to identify (1) what was the impact of COVID-19 on USAID missions' capacity to monitor programs and (2) what steps USAID has taken to mitigate the effects of the pandemic on program monitoring.

To conduct our work, we reviewed documentation and resources from USAID's Bureau for Policy, Planning, and Learning (PPL) and the U.S. Global Development Lab;

¹ For further details on monitoring capability reported by missions, see appendix B.

² USAID's Program Net, "Monitoring in the Program Cycle," accessed February 24, 2021.

³ USAID OIG, "[Key Questions To Inform USAID's COVID-19 Response, Advisory Notice](#)," May 21, 2020.

⁴ The Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020, Public Law No. 116-123, provided funding to OIG for oversight of activities funded by USAID under this act.

interviewed USAID officials in Washington, DC with knowledge of USAID monitoring policies and guidance pertinent to COVID-19; and conducted interviews with 26 offices across a judgmental sample of 4 missions to understand the impact of COVID-19 on missions' ability to monitor. The selection of missions was based on overall obligated funding and self-reported monitoring and personnel capacity.

As our audit work was conducted using a judgmental sample of missions, results cannot be generalized to all missions. Further, we did not assess the quality of the monitoring efforts performed nor the quality of the program activities themselves. We conducted our work in accordance with generally accepted government auditing standards. Appendix A provides more detail on our scope and methodology.

SUMMARY

Officials from USAID's Bureaus for Africa, Asia, Latin America and the Caribbean, and the Middle East, and selected missions—USAID/Burma, USAID/Egypt, USAID/Haiti, and USAID/Nigeria—cited challenges to program monitoring efforts, including movement restrictions and technology challenges. These restrictions limited staffs' ability to conduct in-person site visits, limited in-person verification of data from implementers, and kept staff from engaging directly with beneficiaries. However, missions continued some monitoring of foreign assistance programs through adapted approaches. USAID provided monitoring policy flexibilities related to remote monitoring, remote site visits, and deadlines for data quality assessments, as well as guidance designed to help missions.

All the selected missions noted that they benefited from the flexibilities and guidance that USAID provided. They adapted monitoring accordingly, equipping staff with the tools necessary to enable telework to continue operations and using remote monitoring techniques suitable to their operating environments. However, as the pandemic continues to limit the ability of in-person engagement, the extent to which the flexibilities adopted by USAID have been effective at monitoring and ensuring program performance remains unknown. Further, according to the Agency, the inability to use its traditional project monitoring tools, such as in-person site visits, resulted in vulnerabilities to fraud, waste, and abuse. Officials from selected missions stated that in-person monitoring was preferred, noting that there is still a need to conduct in-person site visits and engage directly with implementers and beneficiaries.

We are making no recommendations.

BACKGROUND

In June 2020, the USAID Acting Administrator stated that USAID's core values should be considered when determining the path forward during the COVID-19 pandemic. Two of those core values are excellence and commitment to learning. The Agency defines excellence as a commitment to efficiency, effectiveness, and meaningful results across its work, while commitment to learning is a dedication to improvement and

continuous reflection and evaluation. To uphold these values, the Agency employs a program cycle that involves learning from performance monitoring, evaluations, and other relevant sources of information to make course corrections as needed to advance U.S. foreign policy and inform future programming.

Data collected through monitoring efforts supports program evaluation, aids learning, and informs adaptive management decisions. At a corporate level, monitoring information from missions enables USAID to understand its achievements and tell its story to Congress and the American people.⁵ Methods USAID uses to monitor programs include:

- *Site Visits.* Visits to program sites are used to assess whether an activity is on track to achieve its goals. Site visits serve several important purposes, such as performance monitoring, data verification, learning to inform design and implementation, and checking compliance against Agency requirements. Prior to COVID-19, PPL recommended that site visits be conducted at least once every 6 months.
- *Data Quality Assessments (DQAs).* Program data reported by external parties require an assessment of strengths and weaknesses to understand the extent to which they can be trusted for use in management decisions. A DQA is USAID's standard practice for assessing the strengths and weaknesses of implementer-collected data, documenting any limitations in data quality, and establishing a plan for addressing those limitations. DQAs are required for any performance indicator that is reported outside of USAID and are conducted on a recurring basis.

The Agency emphasizes a comprehensive approach to monitoring that involves various USAID headquarters operating units in Washington, DC, and at overseas missions. The primary responsibility for program monitoring lies with missions. However, several headquarters operating units play a distinct role to ensure effective monitoring. For example:

- PPL is responsible for the Agency's policy for the program cycle and provides interpretation of the policy as needed. Among other duties, PPL supports the policy's implementation and builds the Agency's monitoring capacity by providing training and technical assistance, developing policy and guidance, and leading communities of practice around established and emerging monitoring approaches.
- The U.S. Global Development Lab uses science, technology, innovation, and partnerships to further the Agency's foreign policy and development goals. The Lab applies analysis to identify and prepare for long-term trends—such as climate change, urbanization, and demographic shifts—and to identify the most effective responses to them.
- The regional bureaus—Africa, Asia, Europe and Eurasia, Latin America and the Caribbean, and the Middle East—act as the main link between headquarters operating units and the field. Regional bureaus provide technical guidance and support for their respective field missions in strategic planning, project and activity

⁵ USAID's Program Net, "Monitoring in the Program Cycle," accessed February 24, 2021.

design, monitoring, and evaluation. This includes engaging with PPL and other bureaus to ensure consistent application of the program cycle and to coordinate technical assistance.

SELECTED MISSIONS NOTED CHALLENGES TO PROGRAM MONITORING EFFORTS, INCLUDING MOVEMENT RESTRICTIONS AND TECHNOLOGY CHALLENGES

As of October 2020, officials with four selected regional bureaus—Asia, Africa, Latin America and the Caribbean, and the Middle East—and the four selected missions—USAID/Burma, USAID/Egypt, USAID/Haiti, and USAID/Nigeria—stated that COVID-19 reduced or restricted their ability to monitor programs due to a range of issues, including movement restrictions and access to information technology (IT).

As countries instituted various movement restrictions both within the country and between countries—and as USAID, along with most Federal agencies, was forced to shift to full-time telework—mission officials we interviewed stated that movement restrictions were a challenge to program monitoring. These restrictions limited staffs' ability to conduct in-person site visits, limited in-person verification of data from implementers, and kept staff from engaging directly with beneficiaries.

According to mission officials, this loss of in-person site visits also resulted in the loss of other benefits of direct engagement. For example, a senior official at USAID/Nigeria noted that in-person site visits allowed staff to make connections with implementers and identify opportunities for more programming. Similarly, USAID/Haiti noted that the opportunity to have “spontaneous conversation” with beneficiaries was severely restricted without in-person engagement. Officials from two of the four selected missions noted that COVID-19 intensified movement restrictions that were already in place due to existing safety and security concerns within the host country. For example, USAID/Nigeria had to abide by the Government of Nigeria’s COVID-19 restrictions while also adhering to the Embassy security mandates that required security escorts for site visits. This posed a challenge because as the number of people participating in site visits increased—including security personnel—so did the risk of contracting the coronavirus. Because of significant security concerns related to increased risk of kidnapping, USAID/Haiti already had existing mobility restrictions that some staff observed were further complicated by the COVID-19 restrictions.⁶

In addition, IT challenges were cited by three of the four selected regional bureaus as posing a challenge to monitoring. Officials with the Africa Bureau stated that Internet connectivity was a challenge to program monitoring in their region. Officials from the

⁶ USAID/Burma and USAID/Egypt did not express concerns related to in-country security conditions.

Asia and Latin America and Caribbean Bureaus also noted IT as a regional challenge in their respective regions.

Three of the four reviewed missions reported that IT challenges were also an obstacle to remote program monitoring. Specifically, officials with two missions—USAID/Haiti and USAID/Nigeria—both noted that their country’s lack of Internet infrastructure and power connectivity limitations made it difficult for staff to use available technology and meet virtually with implementers. These challenges required staff to reschedule meetings and calls with implementers when Internet connectivity did not function as needed to allow planned meetings. USAID/Egypt officials stated that Internet connectivity problems at the beginning of the pandemic limited the mission’s ability to work with implementers but noted that they were able to adapt to and mitigate these issues using flexibilities described later in this report.

USAID TOOK STEPS TO PROVIDE MONITORING FLEXIBILITIES AND GUIDANCE DESIGNED TO HELP MISSIONS, BUT THE EFFECTIVENESS OF EFFORTS REMAINED TO BE SEEN AS COVID-19 CONTINUED

USAID headquarters and the selected missions took steps designed to help mitigate the effects of COVID-19 on missions’ abilities to monitor their programs. PPL and selected regional bureaus—Africa, Asia, Latin America and the Caribbean, and the Middle East—disseminated information, provided guidance and flexibilities to support monitoring efforts, and responded to requests made by missions. Officials at all the selected missions stated that they benefited from these efforts and adapted monitoring accordingly, equipped staff with the tools necessary to enable telework to continue operations, and used remote monitoring techniques suitable to their operating environments. However, the effectiveness of these efforts remained to be seen.

USAID Provided Program Monitoring Policy Flexibilities and Guidance To Assist Missions

The USAID Administrator activated the Crisis Action Team on January 31, 2020, and established a COVID-19 Task Force on March 3, 2020. The Task Force was charged with coordinating the Agency-wide approach to COVID-19 and acting as an internal advisory body to ensure consistent messaging, informed decision making, and strategic alignment of the Agency’s priorities. To address the impact of the pandemic, the COVID-19 Task Force communicated directly with missions and established a Mission Overview Dashboard to capture missions’ capacity to continue operations. After assessing COVID-19’s impact on missions’ program monitoring, the Agency established flexibilities and issued guidance focused on remote monitoring and how to address challenges with technology and nonpermissive environments. Additionally, the regional bureaus supported missions in mitigating the effects of the pandemic by providing additional COVID-19 mitigation information and support.

COVID-19 Task Force Communication

The Agency's COVID-19 Task Force held weekly calls with mission directors from March 2020 to September 2020, when the Task Force was disbanded. These calls were intended to share information on how to ensure the safety and security of USAID staff, maintain continuity of operations, and oversee USAID's support to partner countries to respond to COVID-19. During the calls, the Task Force gathered information on mission monitoring challenges, communicated updates on monitoring and evaluation requirements, and shared mission-led solutions to both monitoring and Internet and technology challenges faced due to COVID-19. For example, during a mission directors' call in April 2020, the Task Force suggested the procurement of Internet hotspots and solar power packs, as well as increased cell phone data plans, to address Internet and technology challenges.

Along with weekly mission director calls, the Task Force, in coordination with the Agency's Human Capital and Talent Management office, also established a tracker—the Mission Overview Dashboard—to collect information on the status of missions using a set of standard indicators.⁷ The dashboard went live in April 2020 and was active through September 2020, when the Task Force was disbanded. It was designed to allow mission directors to provide information about indicators, such as personnel capacity and monitoring ability, at a specific point in time. Officials from three missions reviewed noted that they provided survey responses for the dashboard.⁸ For example, a USAID/Burma official noted that, at the request of the Task Force, it provided survey responses indicating that its monitoring was restricted because of the inability to conduct in-country travel. This information was then incorporated into the dashboard.

Monitoring Flexibilities and Guidance

In April 2020, USAID issued two Agency Notices—messages from the USAID Administrator—designed to assist missions during the COVID-19 pandemic: “Reinforcing the Capabilities of Our Foreign Service Nationals During the COVID-19 Pandemic” and “Maintaining the Monitoring of Our Programs During the Pandemic of COVID-19.” The first notice was designed to, among other things, facilitate telework for Foreign Service Nationals through IT equipment and services provided by missions with the support of the Agency's Chief Information Officer. The second notice encouraged the use of remote monitoring, such as using cell phones or data, and provided guidance and resources for remote monitoring.

To assist with the development of guidance issued in response to COVID-19, PPL used lessons learned from past nonpermissive environments and health emergencies to inform its actions. For example, USAID's Office of Afghanistan and Pakistan Affairs reported in 2016 that when USAID personnel could not conduct in-person site visits, the Agency used remote monitoring through Skype and independent local contractors. PPL has since offered these and other options as possible solutions for missions to

⁷ The dashboard was initially called the Agency Status Dashboard.

⁸ Although information was requested by the Task Force, missions were not required to update the dashboard, and not all missions were represented. The selected missions stated that they either updated the dashboard once, or not at all.

mitigate the impacts of COVID-19 on program monitoring, including them in the April 2020 Agency Notice “Adopting Innovative Practices To Continue Monitoring Programs in the Current Operating Environment.” PPL also provided additional guidance to missions and implementers through training, including “Third-Party Monitoring in Non-Permissive Environments.” PPL also hosted webinars, including one entitled “Monitoring During COVID” and another hosted jointly with the U.S. Global Development Lab entitled “Resources for Monitoring During COVID-19.”

To further assist missions, in May 2020, the COVID-19 Task Force and PPL identified and established flexibilities to streamline the monitoring process for missions during the pandemic. As laid out in the Agency Notice “Streamlining Processes To Support Effective Monitoring of Our Programs During the Pandemic of COVID-19,” the flexibilities included remote site visits, a 3-month extension on DQAs, and options to streamline performance management plans.⁹ Additionally, PPL and the U.S. Global Development Lab released guidance and resources designed to help missions continue monitoring during COVID-19, including:

- A “Guide for Adopting Remote Monitoring Approaches During COVID-19,” which provided information on remote monitoring techniques and when they could be employed.
- The Digital Data Collection and COVID-19 guide, which was designed to help missions determine what digital data collection tools could be used to support program monitoring and how to assess those tools.
- The COVID Monitoring, Evaluation, and Learning Resources webpage, which included internal and external guidance, webinars, toolkits, and other materials to assist missions in monitoring during COVID-19.

In October 2020, PPL published the revised Automated Directives System (ADS) chapter 201, “Program Cycle Operational Policy.” The revised USAID policy codified some of the flexibilities provided within the May 2020 notice, including the ability to conduct remote site visits and allowing DQAs to be conducted virtually.

Table I summarizes selected actions taken and guidance USAID issued between March and October 2020 to help missions during the pandemic.

⁹ A performance management plan is a mission-wide tool for planning and managing the processes of monitoring and evaluating performance and impact, as well as learning and adapting from evidence. The plan helps ensure that USAID meets established requirements for monitoring and evaluation and timetables to plan and manage the process of monitoring, evaluating, analyzing progress, and applying learning toward achieving results.

Table 1. Selected USAID Actions and Monitoring Policy and Guidance Issued, March - October 2020

March	April	May	October
<p>March 3: Established the COVID-19 Task Force.</p>	<p>April 8: Activated the Mission Overview Dashboard.</p> <p>April 6: Issued “Considerations for USAID Mission Staff for Programmatic COVID-19 Preparedness and Response: Digital Technologies and Data Systems.”</p> <p>April 10: Issued both “Reinforcing the Capabilities of Our Foreign Service Nationals During the COVID-19 Pandemic” and “Maintaining the Monitoring of Our Programs During the Pandemic of COVID-19.”</p>	<p>May 19: Issued “Guide for Adopting Remote Monitoring Approaches During COVID-19.”</p> <p>May 28: Issued “Streamlining Processes To Support Effective Monitoring of Our Programs During the Pandemic of COVID-19.”</p>	<p>October 29: Revised ADS chapter 201 to codify some guidance from the “Streamlining Processes To Support Effective Monitoring of Our Programs During the Pandemic of COVID-19” notice issued on May 28.</p>

Source: OIG analysis of USAID source documents.

Regional Bureau Resources

In addition to the flexibilities and guidance provided by the Task Force, PPL, and the U.S. Global Development Lab, regional bureaus were also a resource for missions. Regional bureaus provided support to missions when requested, both through ongoing support on other pressing regional issues and through direct COVID-19-related efforts. For example, two bureaus provided additional COVID-19-specific support and information to missions in their region. The Africa Bureau provided information via email on how to conduct remote DQAs, while the Latin America and the Caribbean Bureau hosted virtual forums with monitoring, evaluation, and learning experts to help missions learn more about mitigating the impact of COVID-19 on program monitoring. Officials with the Africa Bureau also noted that the bureau conducted a survey of the region to determine what assistance was needed by missions and identified program monitoring as one of missions’ top six concerns. To address this concern, the office hosted a remote monitoring “Africa Café,” a peer exchange where missions could ask and answer questions about the topic.

Selected Missions Implemented Monitoring Flexibilities To Continue Some Program Monitoring, But Effectiveness of Efforts Remains To Be Determined

According to OIG’s advisory notice that highlighted key questions to inform USAID’s COVID-19 response, the pandemic created new challenges to monitoring USAID’s existing programming by essentially making every USAID country a “nonpermissive environment” as countries severely restricted mobility to contain the virus. Similarly, nonpermissive environments present significant challenges to conducting in-person monitoring and engagement. OIG has consistently reported on the risks associated with

operating in actual nonpermissive environments, including the high risk of fraud, waste, and abuse.

USAID found that the inability to use its traditional project monitoring tools, such as in-person site visits, resulted in vulnerabilities to fraud, waste, and abuse.¹⁰ In line with this, selected missions stated that in-person monitoring was preferred, with missions noting that there is still a need to conduct in-person site visits and engage directly with implementers and beneficiaries. However, given the limitations imposed by the pandemic, selected missions stated that the flexibilities offered by the Agency and the efforts of mission staff that remained in country allowed them to continue, to some extent, to monitor programs, work with implementers, and connect with beneficiaries. Officials with the selected missions stated that they used the following monitoring flexibilities provided by the Agency to help mitigate the effects of COVID-19 on program monitoring:

- *Remote Monitoring.* Of the three policy flexibilities used, interviewees stated that they used remote monitoring regularly because COVID-19-related movement restrictions required telework and prevented in-person site visits. Specifically, officials with all four missions stated that a range of mission offices used remote monitoring despite IT challenges, including offices overseeing education, democracy and governance, and economic growth programs. Through remote monitoring, including the use of phone lines and Internet, missions stated that they continued speaking with implementers, received required reports as well as photos and videos of activities, and collected and verified data through triangulation with data sources and, when possible, in-person site visits. For example, USAID/Nigeria officials noted that they conducted assessments via phone to measure the learning achievements of beneficiaries who received instruction through radio-led classes. USAID/Egypt officials cited increased communications with implementers during the pandemic, including initiating weekly reporting, daily audio calls, and video calls. USAID/Egypt also used pictures and video from the field. Before COVID-19, missions were expected to perform in-person site visits at least once every 6 months. USAID/Nigeria officials explained that past in-person engagement allowed staff to directly interact with beneficiaries, observe and identify any problems, and gain insight into potential areas for programs, without the same level of reliance on virtual engagement that they used during the pandemic.
- *Remote Site Visits.* As COVID-19 forced a shift to remote monitoring, mission officials noted that, in addition to virtual engagement, they also used remote site visits to monitor program activities. This included observing activities in the field through live video and viewing photos, documents, and online activities—such as community meetings—to compensate for the loss of in-person site visits. For example, USAID/Haiti officials stated that they conducted a remote site visit for the mission’s reforestation program using video and audio calls with implementers at the project site instead of in-person site visits during which staff would monitor and inspect implementer progress. Similarly, USAID/Nigeria officials stated that they conducted a

¹⁰ COVID-19 Task Force After-Action Review Final Report, January 2021.

remote site visit of an internally displaced people camp using a video call with one of USAID's local implementers. For both USAID/Burma and USAID/Egypt, mission officials stated that they attended virtual activities hosted by implementers—which normally would have been provided in person—and obtained information on the content provided to beneficiaries, as well as information on the beneficiaries themselves. USAID/Burma officials noted that some virtual activities allowed both the mission and implementers to reach a larger number of beneficiaries than they might have had they held the event in person.

- *Data Quality Assessments.* Another flexibility provided by the Agency occurred when in-person site visits were necessary to conduct DQAs or the mission needed more time to conduct assessments virtually. In these cases, the Agency allowed missions to request to extend deadlines for up to 3 months. One of the four missions we reviewed—USAID/Egypt—requested the extension for its DQAs to conduct additional research on a few indicators and eventually completed the DQA remotely. Of the other missions, USAID/Burma officials noted that they completed their DQAs virtually and did not need the additional time. Another mission—USAID/Nigeria—stated it conducted remote DQAs but already had an extension in place for a reason not related to COVID-19.

To address IT challenges and facilitate the ability of staff to continue to monitor programs, all four selected missions assisted staff in the transition to telework by providing equipment, power sources, and access to resources. Three of the four missions—USAID/Egypt, USAID/Haiti, and USAID/Nigeria—provided staff with equipment such as phones, tablets, and computers to monitor programs remotely. Additionally, two missions provided power sources to mitigate the effects of power shortages and surges. Specifically, USAID/Nigeria officials stated that each staff member was provided a phone and a tablet with expanded data, as well as services across three Internet providers to ensure maximum access for virtual meetings and monitoring activities while teleworking. Similarly, USAID/Haiti officials noted that staff were provided laptops, cell phones, and Internet support; the mission also started a pilot project that provided 20 solar panel chargers to staff to assist with power fluctuations while monitoring remotely.

Despite these efforts, remote monitoring had limitations. According to information shared by USAID, remote monitoring limited access to the beneficiary perspective, provided fewer data points, and limited the ability to see what was happening on the ground in real time. The missions we interviewed expressed concerns about remote monitoring, the lack of in-person site visits, and the information they could have been missing working in a virtual environment. For example, USAID/Egypt officials noted that rural communities are difficult to reach through remote means due to lack of access to IT, which limited contact with the beneficiaries in those areas. Similarly, USAID/Nigeria officials stated that when in-person site visits are not conducted, the mission loses the ability to better develop relationships with implementers and identify opportunities for more programming related to ongoing activities. At the time of this audit, the overall extent to which the Agency's adapted monitoring approaches and flexibilities provided adequate oversight of programs was unclear. As noted by officials from two of the

regional bureaus, the extent to which these ongoing measures were effective and provided sufficient oversight was still unknown given the continued pandemic and its impact.

CONCLUSION

Since the start of the COVID-19 pandemic, USAID has taken steps, both at the headquarters and mission level, to respond to the challenges the pandemic poses to program monitoring—a key element of effective stewardship of taxpayer resources. Agency offices and staff have shown flexibility and adapted to the constraints on movement and IT. However, as noted by officials interviewed, remote engagement cannot fully replace direct, in-person interaction with implementers and beneficiaries and direct observation of program activities. Full reliance on remote monitoring limits access to beneficiary perspectives, provides fewer data points, and limits the Agency’s ability to see what is happening on the ground in real time. As the pandemic continues to limit in-person engagement, the extent to which the flexibilities adopted by USAID have been effective at monitoring and ensuring program performance remains unknown. It will take time to determine whether the Agency’s efforts have been effective in ensuring that activities achieved intended results, recipients met applicable requirements and had effective internal controls in place, and activities were free from fraud, waste, and abuse. In particular, the effectiveness of USAID’s limited monitoring during the COVID-19 pandemic will likely be seen later on through mechanisms such as Agency program evaluations and independent financial and performance audits.

OIG RESPONSE TO AGENCY COMMENTS

We provided our draft report to USAID on April 21, 2021, and on April 30, 2021, received the Agency’s response, which is included as appendix C. USAID also included technical comments, which we considered and incorporated into the final report as appropriate.

APPENDIX A. SCOPE AND METHODOLOGY

We conducted our work from October 2020 through April 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our audit objectives were to identify (1) what was the impact of COVID-19 on USAID missions' capacity to monitor programs and (2) what steps USAID has taken to mitigate the effects of the pandemic on program monitoring.

The audit scope included USAID actions taken between January 2020 and November 2020. This period was selected because in January 2020, COVID-19 was declared a Public Health Emergency of International Concern and USAID activated the Crisis Action Team. We considered USAID updates through the end of January 2021, when the audit team concluded fieldwork.

In planning and performing the audit, we gained an understanding and assessed internal controls that were significant to the audit objectives. Specifically, we designed and conducted procedures related to internal control principles 5, 6, 7, 9, 10, 12, 13, and 14 under the five components of internal control as defined by GAO.¹¹

To answer the first objective, we conducted detailed interviews with USAID officials at a judgmental sample of four missions. Our considerations for the selection of these missions for detailed interviews included the following:

- The dollar amount of U.S. foreign assistance funding obligated by those missions in fiscal year 2020, with emphasis placed on higher amounts.
- The self-reported monitoring status as listed on the USAID COVID-19 Mission Overview Dashboard, with emphasis placed on missions with a “restricted” status.
- The self-reported personnel capacity of missions as listed on the USAID COVID-19 Mission Overview Dashboard, with emphasis placed on missions with a “reduced” status.

Based on the above considerations, we selected USAID/Burma, USAID/Egypt, USAID/Haiti, and USAID/Nigeria for review. We conducted 17 interviews across 26 offices at these missions. We conducted audit work at each of these missions through remote video conferences, interviewing officials from each mission's technical and program offices who were closely involved with program performance monitoring to obtain information on how their ability to monitor programs has been impacted by

¹¹ GAO, “Standards for Internal Control in the Federal Government,” September 2014. The 8 internal control principles are: Principle 5 – enforcing accountability; Principle 6 – defining objectives and risk tolerances; Principle 7 – identifying, analyzing, and responding to risks; Principle 9 – identifying, analyzing, and responding to change; Principle 10 – designing control activities; Principle 12 – implementing control activities; Principle 13 – using quality information; Principle 14 – communicating internally.

COVID-19. We also interviewed the mission directors and deputy mission directors to obtain additional perspectives on COVID-19's impact on missions' capacity to monitor programs and the Agency's efforts to mitigate this impact.

To answer the second objective, we interviewed officials from PPL responsible for developing and issuing guidance, as well as officials from four selected regional bureaus who supported the operations of the selected missions. Specifically, we interviewed program staff from the Bureaus for Africa, Asia, Latin America and the Caribbean, and the Middle East. We did not interview the Bureau for Europe and Eurasia because none of the selected missions were in that region. We also interviewed officials from the technical support offices within the Bureaus for Africa and the Middle East. We obtained information on the extent to which USAID headquarters identified and took steps to mitigate mission-level monitoring challenges due to the impact of COVID-19. We also asked how often PPL and regional bureaus were in communication with the missions and provided information and resources to missions. In interviews with USAID/Burma, USAID/Egypt, USAID/Haiti, and USAID/Nigeria, we obtained information on the extent to which the efforts of PPL and the regional bureaus mitigated the impact of COVID-19 on missions' abilities to monitor programs. In addition, we obtained information on the efforts of the selected missions to mitigate the effects of COVID-19 on program monitoring.

The findings of this audit cannot be used to make inferences about the impact of COVID-19 on other USAID missions' capacities to monitor programs. In addition, audit procedures were limited to reviewing program monitoring. Activities performed by contracting officer's representatives and agreement officer's representatives for contract oversight were not included in our scope. The data we used to support audit results primarily came from interviews from across the Agency. We assessed a low level of risk related to the quality of this data in performing our audit and considered the risks as not significant in the context of using the data in answering our audit objectives. As such, we considered the data sufficiently reliable for the purposes of our audit.

APPENDIX B. LIST OF MISSION-REPORTED MONITORING CAPABILITY, AS OF OCTOBER 2020

The following information is presented as reported in the USAID Mission Overview Dashboard.

Routine		
Angola	Niger	Mozambique
Azerbaijan	North Macedonia	Namibia
Cambodia	Paraguay	Nepal
Philippines	Serbia	Nigeria
Regional Development Mission for Asia	Southern Africa	Pakistan
Somalia	Tanzania	Peru
	Timor Leste	Rwanda
	Uganda	Senegal
	Ukraine	Sierra Leone
	Vietnam	South Sudan
	West Africa	Sri Lanka
		Sudan
Reduced	Restricted	Syria
Afghanistan	Albania	Tunisia
Armenia	Bangladesh	West Bank/Gaza
Bosnia-Herzegovina	Benin	Yemen
Botswana	Burkina Faso	Zambia
Brazil	Burma	Zimbabwe
Cameroon	Burundi	
Caucasus	Central Asia Regional	Source: USAID Mission Overview Dashboard.
Colombia	Democratic Republic of Congo	
Cote D'Ivoire	Djibouti	
El Salvador	Dominican Republic	
Eastern and Southern Caribbean (Barbados)	Egypt	
Ethiopia	Ghana	
Guinea	Guatemala	
India	Haiti	
Indonesia	Honduras	
Jamaica	Iraq	
Jordan	Kenya East Africa	
Kosovo	Kyrgyz Republic	
Lebanon	Liberia	
Libya	Malawi	
Madagascar	Mali	
Middle East Regional Platform	Mauritania	
Mexico	Morocco	
Moldovia		
Mongolia		
Nicaragua		

APPENDIX C. AGENCY COMMENTS



MEMORANDUM

TO: Emily Gardiner, Global and Strategic Audits Division and Latin American and Caribbean Regional Office USAID Office of Inspector General

FROM: Michele Sumilas, Assistant to the Administrator, Bureau for Policy, Planning and Learning

DATE: April 30, 2021

SUBJECT: Agency Comment(s) to Respond to the Draft Audit Report Produced by the Office of Inspector General (OIG) titled, *USAID Adapted to Continue Program Monitoring During COVID-19 But the Effectiveness of Its Efforts Is Still To Be Determined* (9-000-21-00X-P / 991V0220)

The U.S. Agency for International Development (USAID) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report, which contains no recommendations for USAID.

The COVID-19 pandemic has created operational and programmatic challenges that are unprecedented in USAID's history. In particular, partner country governments and USAID headquarters put precautions in place to safeguard employee, partner, and stakeholder safety; notably, international and in-country travel was, and continues to be, restricted. USAID headquarters responded quickly to the changing context to support Missions to continue to monitor programs. USAID's COVID Task Force and the Bureau for Policy, Planning and Learning worked with experts across the Agency to create additional flexibilities in program monitoring policies. In addition, we shared resources with USAID staff and partners to help them apply alternate approaches to monitoring, including remote methods. Missions were able to pivot and apply these approaches to continue monitoring programs despite the challenges. Learning from this experience has led USAID to codify many of these flexibilities into the Program Cycle Operational Policy (Automated Directives Chapter 201) to allow for remote monitoring methods in non-permissive environments that limit the ability of USAID staff and partners to do in-person monitoring visits due to a variety of causes.

USAID appreciates the analytical work and resulting information provided in this report, and the collaborative engagement by the OIG's audit team.

APPENDIX D. MAJOR CONTRIBUTORS TO THIS REPORT

The following people were major contributors to this report: Emily Gardiner, audit director; Ryan Werner, assistant director; Tifani Dyson, lead auditor; Saifuddin Kalolwala, legal counsel; Wangui Kiundi, writer-editor; Juan Carlos Rivas, auditor; Hugo Solano, auditor; Varun Srirangarajan, auditor; and Rishi Udeshi, auditor.